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November 19, 2024

Via ECF

The Honorable Margo K. Brodie
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *State Farm Mutual Automobile Insurance Company v. Metro Pain Specialist P.C.
et al.*
Docket No.: 1:21-cv-05523-MKB-PK
Our File No.: 428.0567184

Dear Chief Judge Brodie:

I am counsel to Defendants Regina Moshe, M.D., Citimedical I, PLLC, Citimed Services, P.A., Citimedical Services P.C., Citimed Complete Medical Care P.C., and Citimed Management Services Inc. (hereinafter collectively "Citimed Defendants") in the above-captioned matter.

I have reviewed the November 15, 2024 letter and proposed Order filed by counsel for Plaintiff State Farm Mutual Automobile Insurance Company (ECF Doc. No. 633). I have also reviewed the November 18, 2024 letter filed by counsel for Co-Defendants Yan Moshe, Hackensack Specialty ASC LLC, Integrated Specialty ASC LLC, Reuven Alon, Columbus Imaging Center LLC, Medaid Radiology LLC, SCOB LLC, Citimed Surgery Center LLC, NJMHMC LLC, Star Solutions Services, LLC, Beshert Corp., Nizar Kifaieh, M.D., and Premier Anesthesia Associates PA (ECF Doc No. 636).

The Citimed Defendants oppose Plaintiff's request and the contents of the Proposed Order for the reasons set forth by Co-Defendants in ECF Doc No. 636, and hereby join in those arguments.

Respectfully submitted,
LONDON FISCHER LLP

/s/ Thomas Leghorn
Thomas A. Leghorn